



Chapter 5

Categorical Exclusions

Introduction and Purpose of the Chapter

Chapter 5 identifies those actions proposed for consideration as categorically excluded from MEPA documentation under any of the Alternatives as described in Chapter 2 of this PEIS. Categorical exclusions are types (or categories) of actions that normally do not have the potential to cause significant environmental effects. They do not require an EA or EIS, unless extraordinary circumstances occur. The following definition of categorical exclusion is from ARM (Administrative Rules of Montana) 36.2.522 (5)):

‘Categorical exclusion refers to a type of action that does not individually, collectively, or cumulatively require an EA or EIS, as determined by rulemaking or programmatic review adopted by the agency, unless extraordinary circumstances, as defined by rulemaking or programmatic review, occur.’

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5.1 OVERVIEW

Under this PEIS, CE's are appropriate in those situations where no significant impact will occur as a result of the exemption and as provided for in MCA 77-1-121. The level of MEPA review will be commensurate with DNRC's obligations under MCA 77-1-121 recognizing local governmental actions and associated analysis when appropriate.

This chapter also details local government regulations and resulting actions, the level of analysis associated with those actions, and how they interrelate to satisfy MEPA requirements.

CE's are addressed further in the following Administrative Rules references:

5.1.1 Emergency Situations (ARM 36.2.539):

An agency may take or permit action having a significant impact on the quality of the human environment in an emergency situation without preparing an EIS. Within 30 days following the initiation of the action, the agency shall notify the governor and the Montana Department of Environmental Quality (DEQ) as to the need for the action and associated impacts and results. Emergency actions must be limited to those actions immediately necessary to control the impacts of the emergency. "Emergency actions" include, but are not limited to (ARM 36.2.522):

- Projects undertaken, carried out, or approved by the agency to repair or restore property or facilities damaged or destroyed as a result of a disaster when a disaster has been declared by the governor or other appropriate government entity
- Emergency repairs to public service facilities necessary to maintain service
- Projects, whether public or private, undertaken to prevent or mitigate immediate threats to public health, safety, welfare, or the environment

5.1.2 Extraordinary Circumstances

Any additional Categorical Exclusions would apply where there were no extraordinary circumstances. Extraordinary circumstances are situations that may create a potential for significant impacts and would trigger an EA or EIS MEPA analysis.

5.1.3 Categorical Exclusions from MEPA Documentation

Categorical exclusions from MEPA documentation would be pursued under all alternatives under scenarios presented in table 5-1.

Table 5-1. MEPA Exclusions/Exemptions – When Considered/Applied
Exempt per 36.2.523(5) A.R.M.
Lease and License administration including assignments, renewals and enforcement of terms and conditions
Lease/License modifications consistent with local regulations or MEPA document
Project Design
REMB Project List
Marketing
Administrative actions: routine, clerical or similar functions of a department, including but not limited to administrative procurement, contracts for consulting services, and personnel actions
Minor repairs, operations, or maintenance of existing equipment or facilities
Investigation and enforcement: data collection, inspection of facilities or enforcement of environmental standards
Ministerial actions: actions in which the agency exercises no discretion, but rather acts upon a given state of facts in a prescribed manner
Actions that are primarily social or economic in nature and that do not otherwise affect the human environment
Exempt per 77-1-121, M.C.A.
Development or adoption of a growth policy or a neighborhood plan pursuant to Title 76, chapter 1
Development or adoption of zoning regulations
Review of a proposed subdivision pursuant to Title 76, chapter 3
Actions related to annexation
Development or adoption of plans or reports on extension of services; and Other actions that are related to local planning
Property Purchase
Short-term land use license (less than 7 days) involving no resource extraction or developed uses and conformity with applicable local permitting or land use regulations. Examples would include weddings, dog shows, photography shoots, charity fund raising events, etc.

5.2 PROPOSED LOCAL REGULATORY COMPLIANCE UNDER THIS PEIS

The REMB of DNRC would comply with all applicable city, county, state, and federal laws. These include local land use regulations, air and water quality laws, the Antiquities Act, and the Endangered Species Act. Additionally, requirements of other agency programmatic Plans and policies will apply. There are several state law exceptions that apply to state land including: (1) MCA 76-2-402, which applies when an agency proposes to use public land contrary to local zoning regulations; and (2) MCA 76-3-205(2), which exempts state land from subdivision requirements unless the division creates a second parcel for sale, rent, or lease for residential purposes. However, it should be noted the REMB, under this PEIS, intends to waive these rights of exemption.

When evaluating a project proposed for Trust Lands under any of the Alternatives, the REMB would analyze all issues, policies and relevant regulations. The items to be addressed and the level of analysis would vary, depending on the nature of the project, its geographic location and the particular economic, social and environmental context in which it occurs. In general, however, the REMB would:

- Develop programs and actions in consideration of the goals and policies of the local growth policy (comprehensive or master plan), as applicable.
- Evaluate each proposed action using the funnel filtration process as described in Chapter 2 of the PEIS. The filtration process provides a framework for decision-making that follows the intent of MEPA with respect to the evaluation of potential impacts of a proposed action on the natural/physical and socio-economic environments. This would determine if the proposal should move forward.
- Engage in public involvement as provided for in local land use regulatory processes.
- The REMB and its lessees, licensees and permit holders would follow all local land use regulatory processes (zoning and/or subdivision ordinances) as applicable.

5.2.1 Description of Local Government Policies, Processes and Regulations

At the local level, land development is subject to the following statutes:

5.2.1.1 Growth Policies (76-1-601,MCA)

A growth policy may cover all or part of the jurisdictional area and must include the elements listed in subsection (3) of the Statute by October 1, 2006. The extent to which a growth policy addresses the elements of a growth policy that are listed in subsection (3) is at the full discretion of the governing body.

A growth policy must include community goals and objectives, maps and text describing an inventory of the existing characteristics and features of the jurisdictional area, including land uses, population, housing needs, economic

conditions, local services, public facilities, natural resources and other characteristics and features as proposed by the planning board and adopted by the governing bodies. The growth policy must also include projected trends for the life of the growth policy for land use, population, housing needs, economic conditions, local services, natural resources and other elements proposed. In addition, a growth policy must include a description of policies, regulations, and other measures to be implemented in order to achieve the goals and objectives and

- a strategy for development, maintenance, and replacement of public infrastructure, including drinking water systems, wastewater treatment facilities, sewer systems, solid waste facilities, fire protection facilities, roads, and bridges
- an implementation strategy that includes
 - a timetable for implementing the growth policy
 - a list of conditions that would lead to a revision of the growth policy
 - a timetable for reviewing the growth policy at least once every 5 years and revising the policy if necessary
- a statement of how the governing bodies would coordinate and cooperate with other jurisdictions that explains:
 - if a governing body is a city or town, how the governing body would coordinate and cooperate with the county in which the city or town is located on matters related to the growth policy
 - if a governing body is a county, how the governing body would coordinate and cooperate with cities and towns located within the county's boundaries on matters related to the growth policy
- a statement explaining how the governing bodies would:
 - define the criteria in [76-3-608\(3\)\(a\) MCA](#)
 - evaluate and make decisions regarding proposed subdivisions with respect to the criteria in [76-3-608\(3\)\(a\) MCA](#)
- a statement explaining how public hearings regarding proposed subdivisions would be conducted

A growth policy may also:

- include one or more neighborhood plans. A neighborhood plan must be consistent with the growth policy
- establish minimum criteria defining the jurisdictional area for a neighborhood plan
- address the criteria in [76-3-608\(3\)\(a\), MCA](#)
- evaluate the effect of subdivision on the criteria in [76-3-608\(3\)\(a\) MCA](#)
- describe zoning regulations that would be implemented to address the criteria in [76-3-608\(3\)\(a\) MCA](#)

- identify geographic areas where the governing body intends to authorize an exemption from review of the criteria in [76-3-608](#)(3)(a) MCA for proposed subdivisions pursuant to [76-3-608](#) MCA

The planning board may propose and the governing bodies may adopt additional elements of a growth policy in order to fulfill the purpose of this chapter.

After adoption of a growth policy, the governing body within the area covered by the growth policy pursuant to [76-1-601](#) MCA must be guided by and give consideration to the general policy and pattern of development set out in the growth policy in the:

- authorization, construction, alteration, or abandonment of public ways, public places, public structures, or public utilities
- authorization, acceptance, or construction of water mains, sewers, connections, facilities, or utilities
- adoption of zoning ordinances or resolutions.

5.2.1.2 Zoning

- County Zoning – Zoning in unincorporated areas can occur by two methods: (1) the creation of a planning and zoning district, which must be a minimum of 40 acres, known as “Part 1 zoning”; or (2) the establishment of county zoning, which can apply to all or part of the unincorporated area, known as “Part 2 zoning,” but which requires the adoption of a growth policy. Public notification and a public hearing must be held prior to the adoption of either type of zoning.

1. Under Part 1 zoning, the board of county commissioners may create a planning and zoning district upon petition of 60 percent of the freeholders in the affected area. However, if freeholders representing 50 percent of the titled property ownership in the district protest the establishment of the district within 30 days of its creation, the board of county commissioners may not create the district. An area included in a district that is the subject of a protest may not be included in a zoning district petition for a period of one year.
2. Under Part 2 zoning, a board of county commissioners that has adopted a growth policy for the entire jurisdictional area may adopt zoning regulations for all or part of the jurisdictional area

76-2-203, MCA sets forth criteria and guidelines for zoning regulations as follows

- (1) Zoning regulations must be:
 - (a) made in accordance with the growth policy or a master plan, as provided for in [76-2-201](#)(2) MCA; and
 - (b) designed to:
 - (i) lessen congestion in the streets;
 - (ii) secure safety from fire, panic, and other dangers;
 - (iii) promote public health and general welfare;
 - (iv) provide adequate light and air;
 - (v) prevent the overcrowding of land;
 - (vi) avoid undue concentration of population; and
 - (vii) facilitate the adequate provision of transportation, water, sewerage, schools, parks, and other public requirements.
- (2) Zoning regulations must be made with reasonable consideration, among other things, to the character of the district and its peculiar suitability for particular uses and with a view to conserving the value of buildings and encouraging the most appropriate use of land throughout the jurisdictional area.
- (3) Zoning regulations must, as nearly as possible, be made compatible with the zoning ordinances of the municipality within the jurisdictional area.

- Municipal Zoning – The municipal zoning enabling legislation is similar to that for counties. For example, zoning must also be “made in accordance with a growth policy,” interim zoning is authorized, a board of adjustment must be established, and the city or town council may provide for enforcement. Public notification and a public hearing must be held prior to the adoption of municipal zoning. Municipalities have, under certain conditions, the ability to extend the application of their zoning and subdivision regulations beyond their corporate limits in any direction, up to three miles for a city of the first class, up to two miles for a city of the second class, and up to one mile for a city or town of the third class. This authority is only conferred on municipalities that have adopted a growth policy, but does not apply in locations where a county has adopted a growth policy and accompanying zoning or subdivision regulations. Under these provisions, a municipality may enforce zoning or subdivision regulations as if the affected property were in its corporate limits. 76-2-304, MCA sets forth the purposes of municipal zoning as follows:

- (1) Zoning regulations must be:
 - (a) except as provided in subsection (3), made in accordance

with a growth policy; and

(b) designed to:

- (i) lessen congestion in the streets;
- (ii) secure safety from fire, panic, and other dangers;
- (iii) promote health and the general welfare;
- (iv) provide adequate light and air;
- (v) prevent the overcrowding of land;
- (vi) avoid undue concentration of population; and
- (vii) facilitate the adequate provision of transportation, water, sewerage, schools, parks, and other public requirements.

(2) Zoning regulations must be made with reasonable consideration, among other things, to the character of the district and its peculiar suitability for particular uses and with a view to conserving the value of buildings and encouraging the most appropriate use of land throughout the municipality.

(3) Until October 1, 2006, zoning regulations may be adopted or revised in accordance with a master plan that was adopted pursuant to Title 76, chapter 1, before October 1, 1999.

5.2.1.3 Subdivision and Platting

Title 76, Chapter 3, of the Montana Code governs subdivision and platting (the Subdivision and Platting Act). Montana law requires the governing body of every county, city, or town to adopt and provide for the enforcement and administration of subdivisions. Thus, in contrast with zoning, which is optional, subdivision regulation is mandatory in Montana.

The statutes require that subdivision regulations be adopted by the governing body only after a hearing. Subdivision review is a two-part process, review of a preliminary plat and a final plat, which is recorded. There is also an abbreviated process for review of minor subdivisions. Major subdivisions are subject to a public hearing, with published notice and notice to adjoining property owners.

The statutes specify minimum content requirements for subdivision regulations, which include:

- provisions for an environmental assessment (exempt under limited circumstances, such as first minor subdivision)
- procedures for the submission and review of subdivision plats

- the form and content of preliminary plats and documents to accompany the final plats
- identification of areas unsuitable for subdivision due to natural or human-caused hazards
- prohibition of subdivisions for building purposes for areas within the 100-year floodway
- standards for the design and arrangement of lots, streets and roads, grading and drainage, water supply, sewage, and solid waste disposal that meet regulations adopted by the department of environmental quality, and the location and installation of utilities
- procedures for review of preliminary plats by affected public utilities and agencies of local, state, and federal government having a “substantial interest” in a proposed subdivision
- procedures for the administration of park and open-space dedication requirements
- provisions for the establishment and recording of ditch easements.

5.2.1.4 Sanitations in Subdivisions Act

Title 76, Chapter 4 of the MCA is the Sanitation in Subdivisions Act, which is intended to protect the quality and potability of water for public water supplies and individual wells. The act charges the Department of Environmental Quality (DEQ) with adopting rules, including sanitary standards, necessary for administration and enforcement of the act. The rules must provide the basis for approving subdivision plats for various types of water (including stormwater drainage), sewage facilities, and solid waste disposal, both public and private, and must be related to the size of lots; contour of land; porosity of soil; groundwater level; distance from lakes, streams, and wells; type and construction of private water and sewage facilities, and other facts affecting public health and quality of water for uses relating to agriculture, industry, recreation, and wildlife.

5.2.1.5 Floodplain and Floodway Management

Montana has a Floodplain and Floodway Management Act, MCA, Title 76, Chapter 5, and the lead state agency for administering it is the DNRC. Under MCA 76-301, local governments must adopt land-use regulations that meet or exceed minimum standards of the department in regards to controlling development in the designated floodplain or floodway. The department must enforce its own minimum

standards through a state permit system when the local government has failed to adopt such land-use regulations after receiving state notice.

Annexation – Title 7, Chapter 2, Parts 42 – 47

In all cases of annexation, services must be provided according to a plan provided by the municipality, except for: (1) garbage services if they are already provided; and (2) in first class cities when otherwise mutually agreed upon by the municipality and the real property owners to be annexed.

5.3 RELATIONSHIP OF LOCAL GOVERNMENT PROCESSES TO MEPA ANALYSIS

Tables 5-2, 5-3, and 5-4 use a checklist to show how local government processes may be analogous to and address the various elements in a MEPA analysis. The left side of the table lists elements typically addressed in the MEPA process, and the right side cites how the local government process(es) address these elements. Comments and information from the public and appropriate local, state and federal agencies are sought to enable an analysis of the impacts on the physical, biological, social and economic environment during these local government processes. It is understood that local regulations vary between jurisdictions and, as such, the complexity of the MEPA analysis would correspond to the complexity of local review. In some situations, many elements of MEPA review could be redundant to local review. In other situations, such as minor subdivisions in rural locations, additional MEPA analysis would be expected and necessary.

Table 5-2. PROJECT DEVELOPMENT	
ISSUE	LOCAL LAND USE POLICY/REGULATION
1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED: Provide a brief chronology of the scoping and ongoing involvement for this project.	GROWTH POLICY, ZONING, SUBDIVISION – Each of these regulations require public notification and involvement prior to adoption of local regulations. Project proposals that would amend existing regulations or involve major subdivisions would also require various levels of public notification and public hearings. Public involvement could include legal ads, letters to adjacent and affected property owners, posting signs on affected property, and public hearings before planning boards and elected officials. Additionally, Title 76-6-206, MCA, also requires that all conservation easements shall be subject to review prior to recording by the appropriate local planning authority for the county within which the land lies in order to minimize conflict with local comprehensive planning. This review is advisory in nature.
2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:	GROWTH POLICY, ZONING, SUBDIVISION – Other agencies with jurisdiction are notified during the review processes and provided with an opportunity to comment on draft growth policies or proposed zoning and subdivisions.

3. ALTERNATIVES CONSIDERED:	GROWTH POLICY, ZONING, SUBDIVISION – Alternatives are considered as part of developing growth policies by planning staff, the public and elected officials. Alternative zoning designations are also considered during the zoning process, and alternative subdivision features, such as design and density are considered during the subdivision review process.
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Table 5-3. IMPACTS ON THE PHYSICAL ENVIRONMENT

RESOURCE	POTENTIAL IMPACTS AND MITIGATION MEASURES
4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE: Are fragile, compactable or unstable soils present? Are there unusual geologic features? Are there special reclamation considerations? Are cumulative impacts likely to occur as a result of this proposed action?	GROWTH POLICY, SUBDIVISION – General geological and soil information is gathered during the development of growth policies. More specific information is gathered for the environmental assessment portion of subdivision review as applicable to major subdivisions
5. WATER QUALITY, QUANTITY AND DISTRIBUTION: Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality? Are cumulative impacts likely to occur as a result of this proposed action?	GROWTH POLICY, ZONING, SUBDIVISION, FLOODPLAIN AND FLOODWAY MANAGEMENT – Information on water bodies, aquifers and floodplains is generally included within most growth policies. Site-specific information is more often required during the zoning and subdivision review processes. Any project proposed in a floodplain also requires detailed information.
6. AIR QUALITY: would pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)? Are cumulative impacts likely to occur as a result of this proposed action?	GROWTH POLICY, ZONING, SUBDIVISION – Regional air quality is generally identified during growth policy development. The transportation plan, a component of the growth plan in larger urban areas, must contain an air quality model to estimate transportation impacts. Site-specific air quality impacts are identified during zoning and subdivision review.
7. VEGETATION COVER, QUANTITY AND QUALITY: Would vegetative communities be permanently altered? Are any rare plants or cover types present? Are cumulative impacts likely to occur as a result of this proposed action?	GROWTH POLICY, ZONING, SUBDIVISION – “Vegetation” is often a major element of most adopted growth policies. Important plant communities are generally recognized, including riparian and wetland vegetation. Site specific information on vegetation is normally considered during zoning and subdivision review processes.

<p>8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS: Is there substantial use of the area by important wildlife, birds or fish? Are cumulative impacts likely to occur as a result of this proposed action?</p>	<p>GROWTH POLICY, ZONING, SUBDIVISION – Habitat information is normally gathered from appropriate agencies for the growth policy and resource agencies are generally asked to review and comment on potential impacts of site-specific zoning and subdivision proposals.</p>
<p>9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: Are any federally listed threatened or endangered species or identified habitat present? Any wetland? Sensitive Species or Species of special concern? Are cumulative impacts likely to occur as a result of this proposed action?</p>	<p>GROWTH POLICY, ZONING, SUBDIVISION – Same as # 8 above.</p>
<p>10. HISTORICAL AND ARCHAEOLOGICAL SITES: Are any historical, archaeological or paleontological resources present?</p>	<p>GROWTH POLICY, ZONING, SUBDIVISION – Historical and cultural information is sought from local historic districts and the State Historic Preservation Office (SHPO) during growth policy development and zoning and subdivision review.</p>
<p>11. AESTHETICS: Is the project on a prominent topographic feature? Would it be visible from populated or scenic areas? Would there be excessive noise or light? Are cumulative impacts likely to occur as a result of this proposed action?</p>	<p>GROWTH POLICY, ZONING, SUBDIVISION – Some general information on prominent features is collected for growth policies, but more detailed information, including mitigation measures, are generally identified through the subdivision review process. Zoning considers the mix, location, and density of uses within a community, which has some relationship to aesthetic values. Some communities have design review ordinances that consider architecture and other aesthetic considerations.</p>
<p>12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY: Would the project use resources that are limited in the area? Are there other activities nearby that would affect the project? Are cumulative impacts likely to occur as a result of this proposed action?</p>	<p>GROWTH POLICY, ZONING, SUBDIVISION – Environmental resource demands are addressed during growth policy development. Growth policies and transportation plans typically use a 20 – year timeframe, but are updated more frequently (every 5 – 10 years, depending on the rate of change in an area).</p>

13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA: Are there other studies, plans or projects on this tract? Are cumulative impacts likely to occur as a result of other private, state or federal current actions w/n the analysis area, or from future proposed state actions that are under MEPA review (scoping) or permitting review by any state agency w/n the analysis area?	GROWTH POLICY, ZONING, SUBDIVISION – Other environmental documents are gathered and used during growth policy development, and also referenced and/or provided during zoning and subdivision review.
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Table 5-4. IMPACTS ON THE HUMAN POPULATION

RESOURCE	POTENTIAL IMPACTS AND MITIGATION MEASURES
14. HUMAN HEALTH AND SAFETY: Would this project add to health and safety risks in the area?	GROWTH POLICY, ZONING, SUBDIVISION – Public health and safety are considered throughout the process of developing growth policies and zoning and subdivision review. Health departments, emergency services and other appropriate agencies are asked to review and comment.
15. INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION: Would the project add to or alter these activities?	GROWTH POLICY, ZONING, SUBDIVISION – Growth policies identify areas appropriate and necessary for these activities. Zoning, which must comply with the growth policy, reflects these land use activities, and subdivision review criteria must also address the growth policy and zoning designations.
16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT: Would the project create, move or eliminate jobs? If so estimated number. Are cumulative impacts likely to occur as a result of this proposed action?	GROWTH POLICY, ZONING – Historical and estimated employment data is generally gathered for a growth policy and land use designations take this into account. The economics of a project are generally considered when projects involve a division of land.
17. LOCAL AND STATE TAX BASE AND TAX REVENUES: Would the project create or eliminate tax revenue? Are cumulative impacts likely to occur as a result of this proposed action?	GROWTH POLICY, ZONING, SUBDIVISION – Growth policies identify historical and estimated future income data at the regional level. Specific impacts on the local tax base are generally considered during subdivision review.
18. DEMAND FOR GOVERNMENT SERVICES: Would substantial traffic be added to existing roads? Would other	GROWTH POLICY, ZONING, SUBDIVISION – Larger urban areas in Montana would also have a component of the growth policy that specifically addresses transportation. Evaluating demand for government services is an integral part

Table 5-4. IMPACTS ON THE HUMAN POPULATION

RESOURCE	POTENTIAL IMPACTS AND MITIGATION MEASURES
services (fire protection, police, schools, etc) be needed? Are cumulative impacts likely to occur as a result of this proposed action?	of all three processes.
19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS: Are there State, County, City, USFS, BLM, Tribal, etc. zoning or management plans in effect?	GROWTH POLICY, ZONING, SUBDIVISION – See response to # 13 above.
20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES: Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract? Are cumulative impacts likely to occur as a result of this proposed action?	GROWTH POLICY, SUBDIVISION – Existing and future recreational areas are identified in growth policies. Major subdivisions are subject to park and open-space dedication requirements.
21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING: Would the project add to the population and require additional housing? Are cumulative impacts likely to occur as a result of this proposed action?	GROWTH POLICY, ZONING, SUBDIVISION – Growth policies must include existing and future housing needs, based on population trends. Zoning designations, based on the growth plan, specify the location and density of housing units and other land uses. Location and density of lots is then set during the subdivision review.
22. SOCIAL STRUCTURES AND MORES: Is some disruption of native or traditional lifestyles or communities possible?	GROWTH POLICY, ZONING, SUBDIVISION – The population analysis in the growth policy examines population by race, age and sex. Potentially affected persons and groups are also considered during project review through the zoning amendment and subdivision review processes.
23. CULTURAL UNIQUENESS AND DIVERSITY: Would the action cause a shift in some unique quality of the area?	GROWTH POLICY, ZONING, SUBDIVISION – Identification of these impacts would primarily occur through comments received during the public comment portion of these processes.
24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES: Is there a potential for other future uses? Is future use hypothetical? What is the estimated return to the trust. Are cumulative impacts likely to occur as a result of this proposed action?	GROWTH POLICY, ZONING, SUBDIVISION – These other impacts and potential uses would likely arise during the review of drafts of the growth policy and during the public comment phase of the growth policy, zoning and subdivision review.

